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November 20, 2012

Via ECFS

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: American Cable Association (“ACA”) Notice of Ex Parte Meeting on  
Connect America Fund, WC Docket No. 10-90 and High-Cost Universal  
Service Support, WC Docket No. 05-337**

Dear Ms. Dortch:

On November 19, 2012, Ross Lieberman (ACA), Ed Naef, Samuel Kornstein, and Thor Kendall (consultants to ACA), and the undersigned, Thomas Cohen (Kelley Drye & Warren LLP), had a conference call with the following staff from the Office of Strategic Planning: Jonathan Chambers, Paroma Sanyal, Paul Lafontaine, and Soumitra Das. The purpose of the meeting was to discuss the Commission’s Connect America Fund Phase II cost model proceeding, the *ex parte* submitted on October 23, 2012 by ACA,<sup>1</sup> and the following specific topics:

The drivers for cost/coverage differentials between the greenfield fiber to the DLSAM (“FTTD”) approach proposed by the price cap local exchange carriers and ACA’s brownfield FTTD approach.

The relevant factors that should be used in designing a cost model that would take into account the calculated costs associated with the technology actually deployed by the recipient of the funding (*e.g.* wireline, wireless, satellite).

Factors other than network design and technology, *e.g.* cost of capital, that would have a significant affect on the results of the cost model.

<sup>1</sup> See American Cable Association *Ex Parte* Presentation, WC Docket Nos. 10-90, 05-337 (filed Oct. 23, 2012).

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The views expressed by ACA on the call were consistent with its October 23rd and other *ex parte* filings.

This letter is being filed electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,



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cc: Jonathan Chambers  
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